



August 24, 2012

To: Zaffar Eusuff
Department of Water Resources, Integrated Regional Water Management

From: Ara Azhderian, Water Policy Administrator
San Luis & Delta-Mendota Water Authority

Re: Comments on Draft IRWM Implementation PSP

Dear Mr. Eusuff,

We appreciate this opportunity to comment on the Prop 84 Round 2 Draft Implementation Grant PSP. The following comments are submitted on behalf of the Regional Water Management Group for the Westside-San Joaquin Integrated Regional Water Management Plan (Westside IRWM Plan).

We support the inclusion of DAC cost share waiver, as this will encourage the implementation of projects that meet the water management needs of DACS.

Attachment 7 covers Technical Justification of Projects and is supposed to provide technical justification of the proposed projects claimed physical benefits "...based on expert opinion or local knowledge (for example, from a District Engineer) should be documented with the individual's contact information." Does this imply that the justification must be in the form of an independent review, or can this attachment summarize information that is included in the supporting materials (e.g., excerpts of feasibility studies or other relevant benefit summaries) that may be included in the materials attached in support of the work plan?

We want to express concern with the complexity of the proposed Benefits and Cost Analysis in Attachment 8. While the draft PSP provides a useful method to describe non-monetized benefits, the analysis of monetized benefits will require an analysis that most project proponents will find very difficult, and may reduce the potential for some proponents, particularly DACs, to participate in the implementation grant process.

Again, we appreciate this opportunity to comment. Please feel free to contact me if you should have any questions.

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Sincerely,

A handwritten signature in blue ink, appearing to read 'Ara Azhderian', with a large, stylized loop at the end.

Ara Azhderian
Water Policy Administrator
San Luis & Delta-Mendota Water Authority